1	THE HONORABLE Samuel J. Steiner
2	Chapter 11 Location: Bremerton
3	Date of Hearing: Ex-parte
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6	
7	UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE
8	IN RE: ) ) IN CHAPTER 11 NO.: 09-15727
9	Carolyn Frame )
10	and Charles Frame,  ) MOTION FOR ORDER TO USE POST- PETITION EARNINGS AND CASH COLLATERAL FOR THE PURPOSE
11	) OF CONTINUING BUSINESS ) ACTIVITIES
12	Debtor. )
13	COMES NOW the debtor, <b>Carolyn Frame and Charles Frame</b> , by and through
14	their attorney, DAVID CARL HILL, and moves this court for an Order granting them leave
15	to USE POST-PETITION COLLATERAL FOR THE PURPOSE OF CONTINUING
16	BUSINESS ACTIVITIES AND PERSONAL ACTIVITIES.
17	This Motion is made based upon the affidavit of DAVID CARL HILL, attached
18	
19	hereto and incorporated herein by this reference.
20	/s/David Carl Hill
21	DAVID CARL HILL, WSBA#9560 Attorney for Debtors
22	
23	STATE OF WASHINGTON ) ) ss.
24	COUNTY OF KITSAP )
25	DAVID CARL HILL, being first duly sworn on oath, deposes and states:
26	LAW OFFICE OF
27	DAVID CARL HILL, Hill Law.Com, P.S. 2472 BETHEL RD. SE SUITE A
28	Motion for Order to Use Cash Collateral- 1 -  PORT ORCHARD, WA 98366 (360) 876-5015 FAX: (360) 895-1491

1	That I am the attorney for the debtor above named. Debtor requires the ability to pay
2	personal monthly expenses, and to continue business operations.
3	Based upon the foregoing, I respectfully request that the debtors be granted leave
4	to incur indebtedness for the purchase of a commercial van as set forth.
5	Respectfully submitted.
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7	/s/David Carl Hill DAVID CARL HILL
8	SUBSCRIBED AND SWORN to before me this 9 <sup>th</sup> day of June, 2009
9	Sobserrible first sword to before the time for take, 2009
10	/s/Kevin M. Decker NOTARY PUBLIC in and for the
11	State of Washington. My commission expires: April 1, 2012
12	7-1, commont of product april 1, 2012
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26	LAW OFFICE OF DAVID CARL HILL,
27	Hill Law.Com, P.S. 2472 BETHEL RD. SE SUITE A PORT ORCHARD, WA 98366 (360) 876-5015 FAX: (360) 895-1491
28	Motion for Order to Use Cash Collateral- 2 -